Case 1:08-cr-00038

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA,)
PLAINTIFF,))
vs.) No. 08 CR 38
ANTHONY QUIRIN,) HON. RUBEN CASTILLO,) JUDGE PRESIDING.
DEFENDANT.) Jobde i Residing.

CASE SPECIFIC REQUEST FOR DISCOVERY

Now comes the Defendant, ANTHONY QUIRIN, by and through his attorney, WILLIAM K. HEDRICK, and requests the following discovery pertinent to the specifically charged chase:

- 1. Defendant is charged with receipt and possession via computer of child pornography in violation of 18 USC 2252A (a)(2)(A) and (a)(5)(B).
- 2. That, accordingly, Defendant respectfully moves for discovery directly pertinent to said charges and their related Federal Sentencing Guidelines provisions (see U.S.S.G. §262.2 including commentary), including the following:
 - A.) The precise identities of the producer and distributer of each alleged prohibited materials and data, including their identities and locations, and dates and places of production, dissemination, and distribution;
 - B.) The identities and ages of each alleged participant appearing in said materials; and the method employed in determining identities and ages;
 - C.) The number of images alleged and the methods of computation employed in each instance; and

D.) Whether the Defendant engaged in any production, dissemination, distribution, "bartering", or "trafficking" of or/in prohibited materials and, if so, the complete identification of each alleged occurrence and the materials involved.

Respectfully submitted,

WILLIAM K. HEDRICK

William K. Hedrick, P.C. 750 West Northwest Highway Arlington Heights, IL 60004 (847) 253-2099